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April 7, 2004

Dr. Robert J. Moore
Branch Chief, Compliance & Enforcement Branch
Office of Nutrition Products, Labeling & Dietary Supplements
FOOD & DRUG ADMINISTRATION (HFS-800)
5100 Paint Brush Parkway
College Park, Maryland 20740

APR 19 2004

Ref: **ShapeWorks™ Multivitamin Mineral Complex**

Dear Dr. Moore:

Pursuant to 21CFR§101.93, please be advised Herbalife International of America, Inc. has begun commercializing ShapeWorks™ Multivitamin Complex.

ShapeWorks™ Multivitamin Complex is labeled and promoted with statements provided for in Section 403 (r) (6) of the Federal Food, Drug and Cosmetic Act.

The principal display panel bears the following structure/function claim, "For Everyday Good Health.*" Also appearing on the label is the structure/function claim, "It includes the antioxidant vitamins C, E and beta carotene, plus B-vitamins and a unique blend of herbs.*" Adjacent to the claim is a ruled DSHEA disclaimer, "These statements have not been evaluated by the Food and Drug Administration.* This product is not intended to diagnose, treat, cure or prevent any disease."

Please be advised that we have substantiation on file that this claim is truthful and not misleading.

If you have any questions please do not hesitate to ask.

Sincerely,

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Multivitamin Complex

For Everyday Good Health*
With Minerals & Herbs
Dietary Supplement

90 TABLETS

FORMULA 2

Multivitamin Complex provides 22 essential vitamins and minerals. It includes the antioxidant vitamins C, E and beta carotene, plus B-vitamins and a unique blend of herbs.* Leading nutrition authorities recommend that all adults should take a multivitamin daily.
DIRECTIONS: Take one tablet three times a day with meals.
INSTRUCCIONES: Tomar una tableta tres veces al día con los alimentos.
For Best Results: Combine with ShapeWorks® Formulas 1 and 3, Nutritional Shake Mix and Personalized Protein Powder.
We offer a 30-day money-back guarantee to assure your complete satisfaction. This exclusively formulated product is only available through Herbalife Independent Distributors.
Polydros® is a registered trademark of Tencor Industries, Inc.
*These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

Supplement Facts			
Serving Size: 1 Tablet		Servings Per Container: 90	
Amount Per Serving % DV**		Amount Per Serving % DV**	
Vitamin A (50% as retinyl acetate and 50% as beta carotene)	1667 IU 33%	Zinc (as zinc gluconate)	5 mg 33%
Vitamin C (as ascorbic acid)	50 mg 83%	Selenium (as selenomethionine)	17 mcg 24%
Vitamin D (as cholecalciferol)	133 IU 33%	Copper (as copper gluconate)	0.5 mg 25%
Vitamin E (as dl-alpha-tocopheryl acetate)	10 IU 33%	Manganese (as manganese gluconate)	1.7 mg 85%
Thiamin (as thiamine hydrochloride)	6.7 mg 445%	Chromium (as chromium HEP, polynicotinate and picolinate)	33 mcg 28%
Riboflavin	8.3 mg 488%	Potassium (as potassium gluconate and potassium phosphate)	30 mg <1%
Niacin (as niacinamide)	33.3 mg 166%	Vanadium (as vanadium amino acid chelate)	2 mcg 1%
Vitamin B6 (as pyridoxine hydrochloride and pyridoxal-5-phosphate)	10 mg 500%	Herbal Blend	16 mg 1
Folate (as folic acid)	133 mcg 33%	Choline Bitartrate, Inositol, Bee Pollen, Broccoli, Cabbage, Carrot, Cauliflower, Citrus Bioflavonoids, Garlic, Licorice (Root), Lemonade, Polyols*, Spinach, and Vegetables	
Vitamin B12 (as cyanocobalamin)	2 mcg 33%	** Percent Daily Values (DV) are based on a 2,000 calorie diet.	
Biotin	100 mcg 33%	† Daily Value (DV) not established	
Pantothenic Acid (as d-calcium pantothenate)	6.7 mg 67%	Other Ingredients: Stearic Acid, Silicon Dioxide, Croscarmellose Sodium, Calcium (as calcium carbonate)	
Iron (as ferrous fumarate)	167 mg 11%	Acacia, Microcrystalline Cellulose, Magnesium Stearate, Betaine Hydrochloride, Para Amino Benzoic Acid, Sodium Carboxymethyl Cellulose, Glycine, Ethyl Cellulose, and Polyvinyl Pyrrolidone	
Iodine (as potassium iodide)	50 mcg 33%		
Magnesium (as magnesium oxide)	66.7 mg 17%		

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